

SICC REPORT ON MONITORING
November 14, 2003

During the past two weeks the Compliance Section has conducted the following monitoring in Part C:

Initial monitoring of the following Phase II SPOEs:

<u>SPOE</u>	<u>REGION</u>	<u>AGENCY</u>
2800	19 (Hermann)	Evergreen
3400	25 (Monroe City)	Evergreen
3500	26 (Montgomery City)	Evergreen
1500	7, 21, 23	SEMO
3600	3 (Jefferson County)	SEMO

As was reported at the last SICC, the Phase II SPOEs to be monitored were selected on the basis of the following risk factors:

Child Complaints/Due Process

Anecdotal Information

45 day timelines (% of total referrals over 45 days at some point > 40%)

Eligibility (low DD [<30%]/high Medical [>60%])

Disproportionality

Transition (<20% of meetings held)

Prior to each on-site, SPOE data was reviewed at the Department and individual child files were identified to be reviewed on site. Child files were selected at random based upon the following factors:

Transition
45 day timelines
Eligibility
Data Accuracy

On-site the files were reviewed for the following:

Transition:

Meeting held in a timely manner

If parent agreed, LEA invited to attend

Transition discussion included all required elements and was

Documented on the IFSP

Part C records were transferred to LEA in a timely manner

45 Day timeline:

If 45 day timeline not met, documentation was present that there were justifiable reasons for going over (family initiated delays or in the case of the SPOE, a provider not getting a necessary report to the SPOE in a timely manner [while this is not a justifiable reason for exceeding the 45 days, it is not held against the SPOE as long as they can document that they made an effort to get the report from the provider in order to enable them to meet the 45 day timeline, but were unsuccessful in their efforts. In this case, it is the provider that compliance will work with if they are persistently untimely in getting their reports to the SPOE to enable them to meet their timelines.]

Content of the IFSP:

File review conducted to ensure that all required components of the IFSP are present, including the Written Notification for the IFSP meeting.

Eligibility:

Files of children of various ages/eligibility determinations are reviewed. Eligibility is checked for the following:

All required components are documented on the eligibility determination form.

Documentation confirms that the child met First Steps eligibility requirements.

Documentation confirms that the evaluation procedures were carried out according to Part C requirements.

Service Coordinator:

Files are reviewed to see if all required EI documents are being forwarded to the SPOE by the OSC in a timely manner.

Interviews are conducted with SPOE staff to determine how the SPOE IC communicates with the OSC immediately prior to and following the initial IFSP and also how the SPOE communicates with the OSC after the initial IFSP.

Provision of Notice:

Files are reviewed to determine if Prior Written Notice is provided at all of the required times and that parent consent is obtained when required.

Data Accuracy:

Checks for data accuracy are done through a desk review of data from the Data System as well as checking of data during the individual file review. Some examples of data checked are:

Correct dates entered on forms and into the data system

Duplicate children in system

Authorizations

IFSP meeting and initiation dates

Children are exited (terminated) from the system in a timely manner

Reasons for exiting (termination) are accurate

Referral dates are accurate

Findings from initial monitoring of Phase II SPOEs (these are preliminary findings. The SPOEs monitored do not have final reports yet, so these are just in general.

Consistent issues that we were finding were:

Eligibility—Lack of documentation for the basis of the eligibility

Timelines—Not meeting the 45 day requirement

Content of the IFSP—Outcomes

Transition—for late referral children:

- Meetings not being held or not being held in a timely manner.

- Documentation of parent agreement to invite LEA

- Documentation of invitation to LEA to attend meeting

- Documentation of First Steps information being sent to the LEA (need documentation of what was sent and when to ensure timely receipt of all information that will assist LEA in making an eligibility determination)

Findings from follow-up monitoring: We have done an on-site monitoring with one of the Phase I SPOEs. Again, these results are preliminary. We have covered these with the SPOE, but we have not finalized the results and a final report has not been generated.

When doing a follow-up we typically only look at those items that were found out of compliance during the initial or most recent follow-up monitoring. That is generally true, however, we did not cite transition as an issue during the initial monitoring, but because we had identified Transition from C to B as a focus area, we also looked at this during our follow-up.

Eligibility was an issue during the initial monitoring and continued to be with the follow-up.

- This included insufficient basis for determination of eligibility &/or lack of documentation of the basis for The eligibility determination.

Meeting 45 day timelines was an issue during the initial monitoring and continued to be with the follow-up.

Transition—if it was also found in the follow-up that, for late referral children, transition was not always being discussed at the initial IFSP meeting. There was no documentation that Transition was a purpose of the IFSP meeting or whether the parent wanted to pursue an ECSE eligibility determination and was in agreement to invite the LEA. There was not always documentation that the LEA had been invited. There was not always documentation or sufficient documentation of a plan for transition to Part B on the IFSP and there was not always documentation that the required First Steps information had been provided to the LEA in a timely manner.

Finally, in all areas, we found continuing problems with data entry and forms not being completed accurately or not at all. We also have issues with documentation not being forwarded to the SPOE in a timely manner by the On-going Service Coordinators.

These are all areas of compliance that have been and continue to be problematic in the Part C System. Final reports will be issued to all agencies monitored and the Division will work with those entities to develop a Corrective Action plan to address the issues. Follow-up monitorings will continue to be held until the non-compliance areas have been addressed. Follow-ups will also be done, either by desk review or on-site with the remaining Phase I SPOEs within the next few weeks.

We will also continue to work on a plan for oversight of the On-going Service Coordinators and Service Providers.